

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas
FILED

OCT 29 2018

David J. Bradley, Clerk

United States of America
v.
Karina Lizett JUAREZ (1993/US)Case No. *M-18-2210-M**Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 28, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC § 841	Possession with Intent to Distribute a Controlled Substance / Approximately 4.44 Kilograms of Methamphetamine, a Schedule II Controlled Substance.
21 USC § 952	Illegal Importation of a Controlled Substance / Approximately 4.44 Kilograms of Methamphetamine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.*approved by*
AUG 7 18

Sworn to before me and signed in my presence.

Date: 10/29/2018*8:32 am**Nicholas C. Stott**Complainant's signature*

Nicholas C. Stott, HSI Special Agent

*Printed name and title**Peter Ormsby**Judge's signature*City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby

Printed name and title

Attachment "A"

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On October 28, 2018, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Karina Lizett JUAREZ (hereafter JUAREZ), a citizen of the United States, while attempting to enter the U.S. with approximately 4.44 kilograms (kg) of methamphetamine concealed within two (2) child booster seats in the rear seat the 2006 Chrysler mini-van which she was driving. JUAREZ was accompanied by her two juvenile sons, ages four (4) and five (5), who were seated in the booster seats.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred JUAREZ and the vehicle to secondary inspection for an intensive examination due to a computer lookout.
3. During secondary inspection, a CBP K-9 drug detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
4. CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies in the rear seat area of the vehicle.
5. A physical search of the vehicle revealed a total of four (4) tape wrapped bundles concealed within the two (2) booster seats, which the children were seated in. CBPOs weighed the four bundles, which weighed approximately 4.44 kg on a calibrated scale. CBPOs field tested the substance inside the bundles, with a presumptive positive result for the characteristics of methamphetamine.
6. HSI Special Agents responded to the Hidalgo POE to assist in the investigation. HSI Special Agents interviewed JUAREZ, who denied knowledge of the methamphetamine concealed within the booster seats. However, JUAREZ gave inconsistent statements regarding her travel itinerary and knowledge of the smuggling event. JUAREZ admitted to a previous smuggling event on or about October 25, 2018 where she smuggled drugs into the United States concealed within child booster seats, again with her children present. JUAREZ stated on that occasion, she transported \$800.00 USD back to Mexico.